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To: Attn: PL 106-107 Comments
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Subject: Below you will find the University of Florida's comments to the Federal Register: January 17, 2001, (volume 66, Number 11) Request for Comment; Interim/Draft Plan of Action To Implement Public Law 106-107, the Federal Financial Assistance Management Improvement Act of 1999.

Question I. Application and Reporting Forms

A. Please identify application and reporting forms you believe could be improved or streamlined.

Comment: Standardizing a proposal format for federally funded research projects should be a priority. The PHS 398 application and the NSF's grant application should be used as models. Forms used in these application kits supply enough information that would satisfy any agencies needs. The time and energy institutions and faculty spend completing different proposal formats is enormous. Standardizing a proposal format would provide efficiencies for both grantors and grantees of measurable portions over the long term.

Comment: The non-competing renewal process where grantees receive their future committed funding levels should be standardized. We would encourage all federal agencies that fund multi year projects adopt the NSF model, where the grantee submits an annual report that discusses the results of the research, and upon the satisfactory progress of the research and availability of funds, the out year funding for the next 12-month period is released. Incorporated into such a process could be the NIH SNAP questions. Again the efficiencies of using a standard format would measurable.

Comment: Each federal agency should adopt a Grant Proposal Guidebook that provides clear guidance and instructions for the preparation and submission of proposals. This guidebook should be available on-line and in a visible location. Very good examples of proposal guidebooks are the PHS 398 and the NSF 01-2. They are complete, easy to understand and easy to find on the web.

Comment: The current environment has each federal agency spending enormous resources developing, implementing, and maintaining their own proprietary electronic grant administration systems. Economies of scale are lost, inadequate systems are developed, frustration settles in, and its business as usual. Let's avoid this. Standardizing the process of grant applications, award making, and reporting procedures would allow the potential to build one electronic pre and post award system, with the mandate that all federal agencies use this one system.

B. Please identify specific data elements on these forms that you believe could be eliminated or combined to reduce reporting burden while still providing the Federal agency enough information to manage the program.

Comment: Standardizing a coversheet (modeled after the SF 424, NSF cover sheet, and/or the PHS398) could allow required certifications be incorporated by reference and certified by signing of the application/coversheet and would do away with the requirement of many agencies (DoD, DoE, DoEd) to have full text certifications (e.g., debarment, drug-free, lobbying, etc.) included as part of the application.

Comment: An electronic depository where institutional certifications can be stored and updated as required should be considered. This depository could also hold frequently used numbers (i.e., agencies institutional numbers, CAGE, EIN, SIC, IRB, DUNS etc.) and allow the applications to use one key number which would tie in to the depository and allow the agency to obtain what ever number was needed for what ever aspect of the review, award, payment or other management issue as needed. Any data elements, which are institutional in nature verses application/project specific, could be maintained by the institutions and accessed by the agencies in this depository eliminating inconsistency in completing these elements on individual applications. The ability for automation exists as well where information is pulled into the application from the institutions registration as in the NSF FastLane system.

Comment: Many agencies have already patterned their Budget Forms after NSF's budget form. The detailed budgets should automatically feed into a cumulative budget as in the case of the NSF FastLane. All agencies should then fund continuing years based on the original, detailed budget requests and submission of an annual report reflecting satisfactory progress and the availability of funds. This would reduce applications to new, supplemental and renewal (e.g., NSF, ONR, AFOSR currently do this).

Comment: Report documentation cover pages (i.e. SF298) are required by many of the agencies to accompany the report. These need to be standardized, with clear instructions and delineation between what should be completed by the author of the report verses the receiving organization.

Comment: Patent Reports (i.e. DD882) should be standardized with clear instructions. Currently the DD882 and the PHS Patent Report form are the most commonly used patent forms. Many other agencies do require patent reports, but have no Form requirement. A standard form should be developed. This would allow information to be provided in a consistent format. Patent reporting should be a part of the Edison Project. Edison should be programmed to notify grantors automatically that report has been received.

C. What programs do you think could share common application and Reporting forms that currently do not? Do not limit your response to Programs within the same agency. For example, if there are programs administered by the Department of Agriculture and the Department of Health and Human Services that you believe should share common forms because they share a similar purpose, please identify them.

Comment: Any of the federal programs that support basic and/or applied research, should be able to share common grant application forms, terms and conditions, and reporting requirements and forms.

D. How do you obtain copies of the forms you need for your grant? Are they readily available over the Internet, or are they provided in materials you received from your awarding agency, such as a funding notice or handbook? What forms have been difficult to locate in updated formats?

Comment: Internet is the most common resource.

Comment: Forms should be available in an Interactive PDF format, Word, and Excel. This would allow completion electronically.

Comment: Please look at the IRS web site, which has a well-developed gateway to forms and publications. This could be used as a model for grant forms.

Question II. Terms and Conditions

A. What terms and conditions are attached to your grants that you believe are not treated consistently from program to program, and across the various Federal agencies?

Comment: OMB back in Nov 1993 issued a revised A-110 boilerplate and instructed federal agencies to implement this revision through their CFR's. This implementation process resulted in numerous versions of A-110 with inconsistent rewrites among agencies. Most affected from a grant term and condition perspective was the Revision of Budget Plan and Program Plans section 25. This is where prior approvals such as no cost extensions, pre-award costs, carry forward, and A-21 are waived or not waived. The EPA accomplished in its implementation of A-110 a very clearly written section 25. OMB should implement a revision to A-110 to restate section 25 consistent with the EPA version. Another result that occurred after implementation is that we know have numerous versions of A-110, rather than just one version issued by OMB

Comment: The property standards of A-110 starting at section 30, are interpreted differently between property offices and officers of federal agencies. If a piece of equipment is considered exempt it should be made even more clear than it already is that no further obligations to the federal government exists, including disposition rights. Some still require grantees to obtain disposition instructions on exempt equipment. A-110 is not clear on this issue to some.

Comment: When discussing cost sharing too often language used in RFP's or program guidelines will say cost sharing is "highly recommended" or "strongly encouraged". If cost sharing is required, it should be stated clearly that there is mandatory cost sharing. If it is not a mandatory requirement these statements about cost sharing should not be allowed as it causes ambiguity.

Comment: We are seeing a growing number of special indirect cost rate programs. All programs should use the Federal negotiated rate of an institution for the activity and not have selective programs with special rates.

Comment: General purpose and Special purpose equipment prior approvals are treated inconsistently between agencies and what A-110 tells us.

Comment: Within NIH there are unique guidelines for each division. For instance the Career Awards may be slightly different according to the guidelines of that particular division. It would be easier for faculty to apply if the guidelines were the same across the divisions. During a deadline it is not easy to get in touch with someone for information.

B: How would you suggest the agencies create more uniformity in these terms and conditions?

Comment: More agencies should participate in partnerships like the Federal Demonstration Partnership (FDP). Agencies should keep issues like extensions for time and carryover in the general provisions and not change them by the agency specific provisions. Agency specific terms and conditions should be issued to address conditions that are unique to that agency or provide clarity to the general conditions, not to change the general provisions of A-21 and A-110.

Comment: If an agency is having a problem with the general terms and conditions of A-110 or A-21 they should communicate with other federal agencies first to see if it is a specific problem to them or do other agencies have the same problems. There need to be a forum to do this. Federal Agency participation in FDP would be an excellent platform for these discussions.

Comment: Prior Approval or waived prior approval language may vary from agency to agency. In addition grantees, grantors, and auditors can interpret Prior approval language differently. A federally approved matrix of all those items that may or may not require prior approval should be developed, published and maintained. Areas covered under such a matrix would be, General prior approvals, Cost–related prior approvals, Property related prior approvals, Project Management prior approvals. This matrix would become an invaluable tool of grant administrators and provide for consistent treatment of prior approvals. A very good example of a prior approval matrix is published by the FDP. This is a valuable tool used in n the administering grants under FDP.

Comment: There would be more uniformity between agencies if there were fewer regulations and they were less complicated. It may be helpful to provide agencies examples of acceptable language and have agency guidelines subject to review by other Federal agencies and users (customers). Also, a group such as the Federal Demonstration Partnership (FDP) would provide a forum that would allow Federal Agencies to meet and work on ensuring uniformity for terms and conditions. It is strongly suggested that those Federal agencies that do not participate in the FDP be required to have an active representative at FDP.

Question: III. Payment Systems

(See Matrix on next page for additional comments)

A. What payment systems are you currently required to use to receive grant payments?
B. Which of these systems offer on-line services?
C. Does the use of multiple payment systems by Federal agencies cause a burden on your financial system?

Comment: Multiple systems Increases costs. For example we need a dedicated phone line and modem for the ONR EDI system. Initial costs were software, installation of modem and line, training. Recurring costs are monthly telephone service and maintenance on dedicated line, monthly costs of Value Added Network (VAN) service (~$500 per year) and annual software maintenance and license fee (~$500 per year).

Comment: Use one web-based system for all federal agencies that allows us to track our payment request through to the electronic fund transfer payment. That would also save dollars in time spent researching unidentifiable EFT payments. It would be helpful when a federal agency combined payments into one EFT, they identified EACH invoice being paid.

Question III. Payment Systems (continued)

FEDERAL SPONSORING AGENCY NAME	A. What payment systems are you currently required to use to receive grant payments?	B. Which of these systems offer on-line services?	C. Does the use of multiple payment systems by Federal agencies cause a burden on your financial system?
Agency for International Development	Payment Management System (PMS) Web Site	Yes	The burden on our financial system includes the time consumed in maintaining multiple systems. Training and cross training for all the various systems requires extra time. Add'l time has been spent as 2 agencies have recently changed to ASAP (claiming that PMS is too expensive). The transition was not easy and was time consuming. PMS recently changed software and the qrtly reconciliation (SF272) is still in total disarray. We have not received the report for the quarter ended 12/31/2000. The report for the previous qtr had over 50 errors.
Department of Commerce	Financial Assistance Disbursement System (FADS) Web Site	Yes	
Department of Agriculture	Payment Management System (PMS) Web Site	Yes	
Department of Education	Grant Administration and Payment System (GAPS) via web	Yes	
Department of Energy	Automated Standard Application for Payment (ASAP)	No	
Department of Health and Human Services	Payment Management System (PMS) Web Site	Yes	
Environmental Protection Agency	Automated Standard Application for Payment (ASAP)	No	
Department of Interior	Payment Management System (PMS) Web Site	Yes	
Department of Housing and Urban Development (HUD)	Line of Credit Control System (LOCCS) voice response	No	
National Endowment for the Humanities	Faxed SF 270	No	
Department of Justice	Mailed SF 270	No	
Department of Labor	Mailed SF 270	No	
National Aeronautics & Space Administration	Payment Management System (PMS) Web Site Some branches not on PMS - require qtrly 272 mailed	Yes	
Department of Defense	ONR - Information Exchange System (IES) to draw and EDI-Eagle to send AFOSR - Mailed SF 270 ARO - Mailed SF 270 (unless preplanned schedule of pmts)	Yes No No	**The ONR system requires us to buy expensive software with monthly charges.**
National Science Foundation	Fastlane	Yes	

Question: IV. Audit Issues

A. What could the Federal agencies do to improve your understanding of the Single Audit process?
B. Have you used the Single Audit Clearinghouse to obtain information on sub recipient audits?
C. Do you believe that single audits provide appropriate audit coverage for your programs and the programs where you are a pass through entity?

Question V. Electronic Processing

A. What electronic processing systems do you currently use for your Federal grants? Please note any systems you use due to Federal agency requirements, as well as any systems or technologies your organization uses for other activities.

Comment: The University of Florida has used the following electronic systems. We provide the following comments and rankings on the top systems available:

1) NSF Fastlane - https://www.fastlane.nsf.gov/fastlane.htm

Most all NSF grant proposal submissions and award administration activities are conducted electronically. NSF has done an excellent job taking into consideration the university environment, as well as, making the system extremely user-friendly. It's extremely important to our university to review a proposal "prior" to submission. NSF's system does not allow a PI to submit directly; only the sponsored research office is capable of performing that task.

Favorable functions of FastLane:
a) Proposal has to be approved by Sponsored Research Office prior to submission. SRO performs submission.
b) Testing of electronic signatures.
c) Attachment of PDF files to the proposal. Many of our professors when attaching a file that contains specific symbols and graphs will use software other than Microsoft Word. PDF files allow a user to use different types of software's to accomplish this task.
d) User-friendly system. Warns the user of possible errors.
e) Has both Pre- and Post- Award functions.
f) Fully staffed Help desk. 1-800 number.
g) Listens to its customers' suggestions.
h) Has a demo site. http://www.fldev.nsf.gov/

Unfavorable functions of FastLane:
a) Website gets a big bogged down during proposal submission; however, NSF is addressing this problem.

2) US Dept of Education http://e-grants.ed.gov/e-App/eaHome.asp

This site is one of the better electronic systems available; however, it does have some unfavorable aspects. Federal Agency does not require electronic submissions yet.

Favorable functions of e-Applications:
a) User friendly.
b) Has a 1-800 Help desk.
c) Has a demo site.

Unfavorable functions of e-Applications:
a) PI can submit the proposal prior to and without Sponsored Research Office review and approval.
b) No ability to attach PDF files. This can cause major problems with special symbols and graphs where the intent of the research project description, budget description, etc. is lost because US Dept of Ed MicroSoft Word when it receives a word document changed a font it did not recognize.

3) NIH / ERA Commons https://www-commons.cit.nih.gov/

The proposal submission function of the electronic system is still in testing and currently on hold.

Favorable functions of the ERA Commons:
a) Proposal has to be approved by Sponsored Research Office prior to submission. SRO performs submission.
b) Attachment of PDF files to the project description form.
c) Help desk.

Unfavorable functions of the ERA Commons:
a) NIH in its testing of the E-Snap electronic system did not listen well to the comments from the users.
b) The system does not take into account the sponsored research environment. For example, a Sponsored Official has to approve every single form prior to submission of the proposal vs. NSF Fastlane having a single SRO approval button, thus making the process of proposal submission extremely slow.
c) Help desk is not a 1-800 number, and has limited staff.
d) PDF files. The user only has the ability to attach a PDF file to the project description form. All other forms require input or Copy/Paste.
e) NIH has limited funds to fund this electronic system test and after one year+ this system appears to be at a stand still.

4) American Heart http://www.americanheart.org/research/index.html

Favorable functions of American Heart:
a) Lots of tips and information available to the user.
b) Ability to insert documents into the forms required.

Unfavorable functions of American Heart:
a) PI can submit the proposal prior to and without Sponsored Research Office review and approval.
b) I could not find where AHA provided a 1-800 number and Help Desk.
c) Forms preparation and proposal submission processes are a bit complicated.
d) Difficult to find electronic forms and instructions from the AHA home page.
e) System is not set up to allow multi-users nor limited access for certain users. (i.e. each person has their own queue with their own awards. In order to have one queue with all UF awards, we have to share one password.

5) Other electronic systems that seem to be similar in nature.

Foundation Commons http://www.foundationcommons.org/frame3a.htm
Dept of Energy http://doe-iips.pr.doe.gov/. Not required to submit electronically yet.
Dept of Justice http://grants.ojp.usdoj.gov. Not required to submit electronically yet.

Unfavorable functions of Others:
a) PI can submit the proposal prior to and without Sponsored Research Office review and approval.
b) Limited help for the user.
c) Lacks sophistication when compared to the top 2 on this list.
d) No demo site.

B. What is the likelihood that your organization would utilize an on-line application or financial reporting system?

Comment: Extremely high, if system works properly.

C. How can the agencies best prepare your organization for the future use of electronic processing option for your grants?

Comment: Have systems that are more consistent. Each system currently available contains much different processes making it difficult to learn, and then train University investigators and administrators. The Federal Commons implementation seems to be our only hope to consistency. FastLane should be used as a role model for other federal agency systems.

Comment: In response to PL 106-107, agencies are developing singular electronic systems that have several negative implications. Many systems by-pass the institutions sponsored research offices where Institutional Approval is obtained prior to submission. This may indicates a lack of understanding of research administration by system developers, but more importantly could result in recipient institutions declining to accept an award because the proposal did not meet institutional requirements for submission.

Comment: Institutional costs associated with maintaining different systems for each Federal sponsor requires that recipients pay for training, upgrades for software and hardware, and the maintenance of multiple systems. For example, all the systems discussed in "A" above require time commitments to train faculty and support staff in their utilization.

Comment: Provide a common system, which takes advantage of the best aspects of systems (such as NSF FastLane), which are out there, and working. Phase in the requirement for the use of the system to allow for both the system and the users to be debugged. Allow continuous input for both the users and the participating agencies to continually improve the system. Stagger deadlines so as to not overload the systems and, if overload occurs, provide for some flexibility to avoid penalizing the users (i.e., Eastern time zone has to fight with all other time zones the last 3-4 hours before deadlines for FastLane). Provide, as needed; on site training and 24 hour help lines.

Comment: It appears that the concept of the Federal Commons has not been fulfilled. There are a multitude of committees at various levels working on policy and oversight, business practices and standards and various demonstration projects. It is not clear how all the information and the results are being developed so that there is no confusion in the user community about the various approaches to ERA, there are fewer independent systems, there are uniform data standards, and costs are not prohibitive.